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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Re: O3b Limited Notice of *Ex Parte* Communication; GN Docket No. 14-177; IB Docket Nos. 15-256 & 97-95; RM-11664; and WT Docket No. 10-112

Dear Ms. Dortch:

On April 8, 2016, O3b Limited (“O3b”) met with the following FCC staff members to discuss the above captioned proceeding: Bahman Badipour, Martin Doczkat, Barbara Pavon, Serey Thai (via telephone) and Anh Wride (via telephone), from the Office of Engineering and Technology; Jose Albuquerque and Kal Krautkramer (via telephone) from the International Bureau; and Simon Banyai, Stephen Buenzow (via telephone), Tim Hilfiger (via telephone), Charles Oliver, Brian Regan, John Schauble, Blaise Scinto, Nancy Zaczek (via telephone), and Catherine Schroeder from the Wireless Telecommunications Bureau. O3b was represented by Suzanne Malloy, O3b’s Vice President of Regulatory Affairs, Zachary Rosenbaum, Director, Spectrum (via telephone), Joslyn Read of SAT Strategies, LLC, consulting for O3b (by telephone), and John Hane of Pillsbury Winthrop Shaw Pittman, counsel to O3b.

O3b presented and addressed questions from FCC staff on the technical analysis O3b submitted in this proceeding on March 24, 2016. That technical analysis evaluated (i) the separation distances required to protect 5G terrestrial receivers from interference from earth stations transmitting in the 27.5-28.35 GHz band (“28 GHz band”) and (ii) the potential for interference at the fixed satellite service (“FSS”) satellite receiver from multiple 5G terrestrial transmitters in the 28 GHz band. We noted that O3b’s analysis assumes protection criteria for 5G receivers based on the 47 dB μ V/m field strength value at the geographic border of a 5G licensee’s service area, as proposed in

the NPRM.¹ We emphasized that higher protection values could greatly increase the separation distances shown in O3b's analysis.

We also expressed O3b's growing concern about the potential for aggregate 5G terrestrial interference into FSS satellite receivers. We stressed that any rules authorizing new 5G mobile operations in the 28 GHz band must adequately address terrestrial emissions towards FSS satellites. O3b's analysis predicts relatively small numbers of outdoor 5G transmitters could severely impact the on-orbit receivers of its FSS satellites. O3b has requested in its previous submissions in this proceeding that the Commission analyze and delimit the issue of aggregate terrestrial interference into FSS satellite receivers in a further notice of proposed rulemaking before finalizing any rules authorizing use of the 28 GHz band for mobile service. At a minimum the record must be further developed to properly assess the risk of terrestrial emissions overwhelming wanted signals from O3b earth stations, so as to inform appropriate deployment and operating rules for expanded terrestrial deployment in the 28 GHz band.

During the meeting, we reiterated that O3b supports efforts to find a consensus resolution and is continuing to participate in stakeholder discussions. In response to questions about the recently-submitted high-level outline of a potential framework for sharing the 28 GHz band and the 37.0-40.0 GHz band among FSS operators and new Upper Microwave Flexible Use ("UMFU") licensees,² we indicated that we are reviewing the proposal. We stated that a complete regulatory framework must address (i) terrestrial interference into satellite receivers and (ii) a clear path for new co-primary, site-licensed, FSS earth stations in the 28 GHz band.

Respectfully submitted,



John Hane

¹ *Use of Spectrum Radio Bands Above 24 GHz for Mobile Radio Services*, GN Docket No. 14-177 *et al.*, Notice of Proposed Rulemaking, FCC 15-138 (rel. Oct 23, 2015) ("NPRM"), Appendix A (Proposed Rules) at § 30.204 Field Strength Limits.

² See Notice of Ex Parte, *Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, et al.*, GN Docket No. 14-177, IB Docket Nos. 15-256 and 97-95; RM-11664; and WT Docket No. 10-112, dated April 6, 2016, submitted by EchoStar Corporation and AT&T Services, Inc.

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